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6 Counsel for Plaintiff
SAMSUNG ELECTRONICS CO., LTD.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

0 | SAMSUNG ELECTRONICS CO., LTD.,) No. CV 10-3098 JSW
a Korean corporation,)

1 Plaintiff,

2
3) **JOINT STIPULATION AND**
4) **[PROPOSED] ORDER REGARDING**
5) **MOTION TO DISMISS BRIEFING**

4 PANASONIC CORPORATION, a Japanese
corporation; PANASONIC CORPORATION
5 OF NORTH AMERICA, a Delaware
corporation; and SD-3C LLC, a Delaware
6 limited liability company.

Defendants.

1 WHEREAS, pursuant to a joint stipulation between the parties, which was So
2 Ordered by the Court on August 4, 2010, the deadline for Defendants Panasonic Corporation,
3 Panasonic Corporation of North America, and SD-3C LLC to file motions to dismiss the
4 Complaint in the above-captioned matter is September 24, 2010;

5 WHEREAS counsel for Defendants Panasonic Corporation and Panasonic
6 Corporation of North America, counsel for Defendant SD-3C LLC, and counsel for Plaintiff
7 Samsung Electronics Co., Ltd., have conferred regarding the length of briefs in connection with
8 motion to dismiss briefing;

9 WHEREAS counsel for the parties agree that it would be most efficient and
10 convenient for the Court and the parties for (i) Defendants to submit a single joint motion to
11 dismiss the Complaint and consolidated memorandum of points and authorities in support of
12 their joint motion, rather than individual motions and memoranda; (ii) Plaintiff to submit a
13 single opposition to Defendants' joint motion to dismiss; and (iii) Defendants to submit a single
14 consolidated reply to Plaintiff's opposition;

15 WHEREAS, pursuant to the Court's Civil Standing Orders, each Defendant
16 would be permitted to submit a 15 page brief in support of an individual motion to dismiss, for
17 a total of 45 pages, and Plaintiff would be permitted 15 pages in opposition to each individual
18 motion, for a total of 45 pages;

19 WHEREAS counsel for the parties agree that it would be appropriate to preserve
20 the 45 pages in aggregate briefing that the parties would have enjoyed pursuant to the Court's
21 Civil Standing Orders, and, additionally, that Defendants have asserted that the complexity of
22 the issues presented in the Complaint warrant an additional five pages of briefing for
23 Defendants in support of their joint motion to dismiss and an additional five pages of briefing
24 for Plaintiff in opposition, for a total of fifty (50) pages for each brief. The parties further agree
25 that the page limit for Defendants' reply should be twenty-five (25) pages (which is less than
26 the aggregate 45 pages that would be permissible in three separate replies of Defendants under
27 the Court's Civil Standing Orders);

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1 IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE
2 PARTIES HERETO, through their respective counsel, that:

3 (1) Defendants Panasonic Corporation, Panasonic Corporation of North
4 America, and SD-3C LLC may submit a consolidated memorandum of points and authorities in
5 support of their joint motion to dismiss the Complaint, which shall not exceed ~~fifty~~(³⁰) pages
6 of text.

7 (2) Plaintiff Samsung Electronics Co., Ltd.'s, opposition to Defendants' joint
8 motion to dismiss shall not exceed ~~fifty~~(³⁰) pages of text.

9 (3) Defendants' reply in support of their joint motion to dismiss shall not
10 exceed ~~twenty five~~(²⁰) pages of text.

11
12 Dated: September 17, 2010

Respectfully submitted,

13 DEWEY & LEBOEUF LLP

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24 Counsel for Defendant SD-3C, LLC

25
26 Pursuant to General Order No. 45 § X.B., the filer attests that concurrence
27 in the filing of this document has been obtained from the above signatory.

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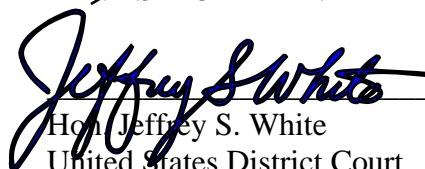
19 Counsel for Plaintiff
20 Samsung Electronics Co., Ltd.

21
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23 in the filing of this document has been obtained from the above signatory.
24

25 [PROPOSED] ORDER
26

27 PURSUANT TO STIPULATION, IT IS SO ORDERED, AS MODIFIED.
28

Dated: September 20, 2010


Hon. Jeffrey S. White
United States District Court